

BRIDGET KENNEDY

California State Bar No. 253416

FEDERAL DEFENDERS OF SAN DIEGO, INC.

225 Broadway, Suite 900

San Diego, California 92101-5030

Telephone (619) 234-8467

Facsimile (619) 687-2666

Bridget_Kennedy@fd.org

Attorneys for RODRIGO GUEVARA-OSUNA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JOHN A. HOUSTON)

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODRIGO GUEVARA-OSUNA,

Defendant.

) Case No.08CR1545-JAH

)

) DATE: August 4, 2008

) TIME: 8:30 a.m.

)

) NOTICE OF MOTIONS AND MOTIONS TO:

) (1) COMPEL DISCOVERY AND PRESERVE
EVIDENCE; and

) (2) GRANT LEAVE TO FILE FURTHER
MOTIONS

)

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY

JOSEPH ORABONA, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on August 4, 2008 at 8:30 a.m. or as soon thereafter as counsel may be heard, defendant, Rodrigo Guevara-Osuna, by and through his attorneys, Bridget Kennedy, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, Rodrigo Guevara-Osuna, by and through Counsel, Bridget Kennedy, and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel Discovery and Preserve Evidence;
- (2) Grant Leave to File Further Motions

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: June 18, 2008

s/ Bridget Kennedy
BRIDGET KENNEDY
Federal Defenders of San Diego, Inc.
Bridget_Kennedy@fd.org
Attorneys for Mr. Guevara-Osuna